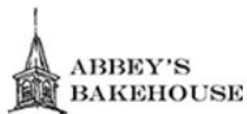




**SERVICE INSPIRED  
RESTAURANTS**

MODERN SLAVERY ACT REPORT



## **SERVICE INSPIRED RESTAURANTS - SIR CORP.**

*This document has been published in accordance with the Fighting against Forced & Child Labour in Supply Chains Act 2023 and constitutes the slavery and human trafficking statement for the Service Inspired Restaurant (SIR Corp.) group of companies for the fiscal year ended 27 August 2023. Forced and child labour are forms of modern slavery and it is essential to contribute to fighting modern slavery.*

### **OVERVIEW**

As an employer and provider of goods and services for guests, we have a role to play in the fight against slavery, servitude, forced labour and human trafficking (**Forced and Child Labour**). SIR Corp. has a desired zero-tolerance approach to Modern Slavery of any kind in our operations and supply chain. It is our responsibility to prevent and identify any exploitation and to influence and work together with suppliers and business partners to raise labour standards in our industry. Despite being an Ontario centric company component parts of the food we serve are sourced outside Canada and it is our responsibility to promote high standards of ethical behaviour across our supply chain in the food we buy and the services we procure.

We do not tolerate forced labour either within our business itself or within our supply chain. We expect our supply chain (whether direct suppliers or those that directly or indirectly supply our direct suppliers) to share the same values.

### **STRUCTURE, ACTIVITIES AND SUPPLY CHAIN**

#### **Our business**

SIR, which stands for Service Inspired Restaurants, is a private company amalgamated under the Business Corporations Act of Ontario. SIR owns 53 Concept Restaurants and Signature Restaurants in Canada (in Ontario, Quebec, Nova Scotia, and Newfoundland). The Concept Restaurants include Jack Astor's Bar and Grill and Scaddabush Italian Kitchen & Bar. The Signature Restaurants are Reds Square One and the Loose Moose Tap & Grill. SIR also owns one Duke's Refresher located in downtown Toronto, and one seasonal restaurant, Abbey's Bakehouse, all located in Canada.

As a responsible business, we recognize our responsibility to ensure that our business activities are guided by the careful balance of the interests of all our stakeholders. For this reason, the Company has established environmental and social policies and procedures as well as programs that protect and sustain the environment, workers within our supply chain and restaurants, and our guests.

#### **Supply chain purchasing model**

Our product supply chains are extensive and global; we source over 1500 products from more than 130 suppliers whose supply chains over 25 countries. We operate a centralized procurement

model in which we have established strong relationships with food, service and non-food suppliers.

### **New suppliers**

We have a rigorous process for assessing new suppliers on their technical capabilities and ethical credentials. We do not engage with business partners, including suppliers, who do not meet our high standards.

### **Our people**

All our team members are paid by bank transfer and we don't allow payment to be made into third party bank accounts thus minimizing the risk of forced compulsory labour. We do employ relatives of team members, however, where possible we avoid this being in a direct reporting relationship and where there is a potential for conflict the Concept Leader and/or HR must be aware and monitor the situation. All team members are paid at least the minimum wage and all tips are paid directly to team members. We have policies and procedures in place to ensure that team members can anonymously report any ethics violations.

## **POLICIES AND DUE DILIGENCE**

### **Open Door Policy**

Regardless of position, all team members will be treated with respect and in a fair and just manner. We have an open door policy which is designed to encourage team members to discuss work related problems or issues with their managers as they arise. We also have a formal dispute resolution process which encourages team members to be heard without fear of reprisal.

### **Ethics Hotline**

We provide a confidential reporting hotline for team members and third parties available 24 hours, 7 days a week to ensure that any matters of ethical concern in order to trigger an independent investigation and appropriate follow up action.

### **Governance**

We are committed to ensuring that everyone who helps make our products is treated with dignity and respect in safe and fair workplaces. The relevant head of each business area such as Concept Leader and the Vice Presidents of the Procurement, Legal, Real Estate, Finance, Marketing and IT teams have responsibility for their department's compliance with responsible sourcing. All policies are approved by the CEO and Chairman annually.

We are currently in the process of establishing our policies and due diligence processes in relation to forced labour and child labour.

## **RISK ASSESSMENT**

We are in the process of identifying the organization's activities and supply chains that carry a risk of forced labour or child labour being used and coming up with the steps we will take to manage that risk.

### **Assessment of effectiveness in preventing Modern Slavery**

We will continue to keep under review new risks as they emerge and carefully monitor new suppliers and business activities. We believe in continuous improvement in the prevention of Modern Slavery and we will continue to review our ethical trading programme annually to ensure it reflects best practices.

### **REMEDIATION MEASURES**

We currently have not taken any remediation measures, however we are researching implementing a forced labour and child labour remediation policy to roll out to all suppliers.

### **TRAINING**

We recognize the importance of training to ensure our team members are able to identify unethical practices and act on them accordingly. We provide a range of modules to all our team members through our E-Learning platform. The training includes both mandatory and voluntary modules on:

- Health and Safety (mandatory);
- Harassment and bullying (mandatory);
- Diversity and inclusion; and
- Whistleblowing.

### **EFFECTIVENESS ASSESSMENT**

SIR Corp. does not currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its supply chains.

### **NEXT STEPS**

In Fiscal 2024, SIR Corp. intends to provide periodic training to its team members on the subject of modern slavery and our policies to address the risks to help increase education and awareness. We intend to introduce training for our procurement team on how to spot signs of modern slavery in the supply chain and when negotiating supplier contracts.

This statement was approved by the Board of Directors of SIR Corp. on April 24, 2024.

Signed,



Peter Fowler  
Chief Executive Officer